

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
and as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan,
and as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

STIPULATION TO EXTEND RESPONSE PERIOD TO AMENDED COMPLAINT

[¶1] Plaintiff, Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., and as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed his Adversary Complaint against the Defendants, including Defendant Miguel Paredes, and the Court issued a Summons on August 26, 2024. *Docs. 1 and 2.* Answers to the Adversary Complaint were due by September 25, 2024. *Doc. 2.* Plaintiff filed an Amended Complaint on September 25, 2024, triggering a new response time for Defendant Paredes. *Doc. 11.*

[¶2] Therefore, Plaintiff and Defendant Paredes stipulate that Defendant Paredes has until October 25, 2024 to respond to the Amended Complaint.

Dated: September 29, 2024

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Dated: September 27, 2024

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